

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**BALANACED BRIDGE FUNDING,
LLC**

Plaintiff,

v.

SOUTH RIVER CAPITAL, LLC, et al.,

Defendants.

Civil Action No. 2:20-cv-05490-PD

DEFENDANTS' MOTION TO DISMISS

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendants South River Capital, LLC, and James E. Plack, through undersigned counsel, making a special limited appearance to challenge jurisdiction, hereby move this Court for an order dismissing Plaintiff's Complaint and claim against Defendants. As set forth more fully in the accompanying memorandum of law, Plaintiff's claim against Defendants should be dismissed because this Court lacks personal jurisdiction over Defendants for the claim alleged in Plaintiff's Complaint. Accordingly, Plaintiff's Complaint and any claim raised therein should be dismissed.

Respectfully submitted,

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Respectfully submitted,

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Will seek admission *pro hac vice*